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AUG 30 1996
BUREAU OF
AIR REGULATION

August 29, 1996

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Cargill Fertilizer, Inc.
Riverview Phosphoric Acid Plant: PSD-FL-231; 0570008-004-AC
Bartow Phosphoric Acid Plant: PSD-FL-224; AC53-262532

Dear Mr. Linero:

This correspondence is a follow up to our telephone conversation last week concerning Cargill Fertilizer's phosphoric acid plants. Cargill Fertilizer operates phosphoric acid plants at the Riverview and Bartow fertilizer production facilities. Each of the phosphoric acid plants are currently under construction permits, and each of these permits contain a condition which limits total fluoride emissions from the phosphoric acid plants. In the Riverview construction permit, Specific Condition 4 limits fluoride emissions from the Nos. 3 and 4 Phosphoric Acid Plants to 2.29 lb/hr and 10.03 TPY. A total of 3 scrubbers are regulated under this permit. In the Bartow construction permit, Specific Condition 4 limits fluoride emissions from the Nos. 4 and 5 Phosphoric Acid Plants to 2.29 lb/hr and 10.01 TPY. A total of 3 scrubbers are regulated under this permit.

The purpose of this correspondence is to clarify that the fluoride limits contained in these two permits apply to the specific emission sources in each plant which are vented to the regulated scrubbers. These sources include affected units regulated under the NSPS for phosphoric acid plants (40 CFR 60, Subpart T), which consists of reactors, filters, evaporators and hot wells. The U.S. EPA, in a letter to Clair Fancy dated September 15, 1995, clarified that only reactors, filters, evaporators and hot wells are covered under the NSPS standards. Other non-NSPS sources may also be vented to the regulated scrubbers.

Other non-NSPS sources which are not vented to the regulated scrubbers, such as fugitive emissions from filters and emissions from clarifiers and tanks, are not covered under the specific emission limits contained in the permits. These non-NSPS sources within the phosphoric acid plants are considered to be insignificant, and are not regulated under the permit. This clarification would also be consistent with the testing requirements specified in the above referenced permits, which requires source testing for only the regulated scrubbers.

If no comments are received from the Department in regards to this correspondence, it will be concluded that the Department is in agreement with our interpretation.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

cc: David Jellerson
Kathy Edgemon
File (2)

DB/mlb

cc: *J. Reynolds, BAR*
B. Thomas, SWD
J. Campbell, EPCHC
J. Bunyak, NPS
J. Harper, EPA
R. Harwood, Polk Co.

SEAL
Florida P.E. #19011

14363A/3

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5405 West Cypress Street
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1801 Clint Moore Road
Suite 105
Boca Raton, Florida 33487
407-994-9910 FAX 407-994-9393

7785 Baymeadows Way
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 P Street NW
Suite 350
Washington, DC 20036
202-462-1100 FAX 202-462-2270



August 22, 1996

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
AUG 23 1996
BUREAU OF
AIR REGULATION

Re: Cargill Fertilizer, Inc.
Riverview Nos. 3 and 4 Phosphoric Acid Plants
Technical Evaluation and Preliminary Determination
PSD-FL-231 (0570008-004-AC)

Dear Mr. Linero:

Cargill has received the Department's Technical Evaluation and Preliminary Determination (TE&PD), draft permit, and Intent To Issue notice dated July 11 regarding the above-referenced permit application. Based upon review of the TE&PD and draft permit, the following comments are submitted.

Specific Condition 4 - This condition implies that total emissions from all sources within the phosphoric acid plants are limited to 2.29 lb/hr and 10.03 TPY. This condition should be clarified to specify that the limits apply to the three reactor and filter scrubbers and not to non-NSPS sources such as fugitive emissions and emissions from clarifiers and tanks. The U.S. EPA, in a letter to Clair Fancy dated September 15, 1995, clarified that only reactors, filters, evaporators, and hot wells are covered under the NSPS standards. In addition, the non-NSPS sources within the phosphoric acid plants are considered to be insignificant and not necessary to be regulated. This clarification would also be consistent with the testing requirements specified in Specific Condition 5. Suggested wording for Specific Condition 4 is as follows:

....fluoride emissions from the three reactor and filter scrubbers in the Nos. 3 and 4 Phosphoric Acid Plants shall not exceed 2.29 lb/hr and 10.03 TPY.

In regard to the BACT determination, the written determination was not attached to Cargill's or KBN's copies of the draft permit. We would appreciate receiving a copy of this document.

Please call if you have any questions concerning these comments.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

cc: *J. Reynolds, BAR*
B. Thomas, SWD
D. Campbell, Hillsboro
G. Harper, EPA
G. Bunyak, NPS

cc: David Jellerson
Kathy Edgemon
File (2)

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Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Cargill Fertilizer, Inc.
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Technical Evaluation and Preliminary Determination
PSD-FL-231 (0570008-004-AC)

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Sincerely,

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011

cc: David Jellerson
Kathy Edgemon
File (2)

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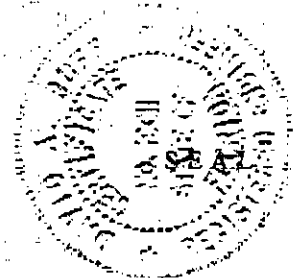
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Washington, DC 20036
202-467-1100 FAX 202-463-2270

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AN AFFIRMATIVE ACTION EMPLOYER

TOTAL P.01

Post-It® Fax Note	7671	Date	8/22	# of Pages	1
To	AL Linero	From	David Buff		
Co./Dept.	FDEP	Co.	KBN		
Phone #		Phone #			
Fax #	904-922-6979	Fax #			



RKV
7/26



**CARGILL
FERTILIZER, INC.**

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AUG 1 1996

BUREAU OF
AIR REGULATION

8813 Highway 41 South - Riverview, Florida 33569 - Telephone 813-677-9111 - TWX 810-876-0648 - Telex 52666 - FAX 813-671-6146

CERTIFIED MAIL: P 204 944 575

D.E.P.

JUL 26 1996

SOUTHWEST DISTRICT
TAMPA

July 24, 1996

Florida
Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, FL 33619

Subject: Proof of Publication - Notice of Intent to Issue Permit PSD-FL-231
to Cargill Fertilizer, Inc., 8813 Hwy. 41 South,
Riverview, Florida 33569

Gentlemen:

You will find attached Proof of Publication of the Notice of Intent to Issue a Permit for the purpose of allowing phosphoric acid production rate of the Nos. 3 & 4 Plants to be increased from a total of 139 to 170 tons of P205 per hour along with the installation of a new packed scrubber for the No. 3 Acid Filter, as required by Florida Department of Environmental Protection.

If there are any questions, please contact me at (813) 671-6158.

Sincerely,

E. O. (Ozzie) Morris
Manager,
Environment, Health & Safety

cc: J. Reynolds, BAR
B. Thomas, SWD
G. Campbell, EPCHC
D. Buff, KBN
EPA
NPS

/dh
Enclosure

x.c. D. Clark, M. Russo, D. Jellerson
File: P-20-3



THE TAMPA TRIBUNE

Published Daily

Tampa, Hillsborough County, Florida

State of Florida } ss.
County of Hillsborough }

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

STATE OF FLORIDA

was published in said newspaper in the issues of

JULY 21, 1996

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me, this 23 day of JULY, A.D. 19 96

Personally Known or Produced Identification
Type of Identification Produced

(SEAL) [Signature]

(received) within 14 days of publication of this notice, in the Office of General Counsel at the above address of the Department. Failure to petition within the allotted time frame constitutes a waiver of any rights such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at: Department of Environmental Protection, Bureau of Air Regulation, 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Administrator, New Source Review, Bureau of Air Regulation, at the Department's Tallahassee address. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination. Further, a public hearing can be requested by any person(s). Such requests must be submitted within 30 days of this notice.

3160 7/22/96

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF INTENT TO ISSUE PERMIT PSD-FL-231

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to Cargill Fertilizer, Inc., 8813 Highway 41 South, Riverview, Florida 33569. This company operates a phosphate fertilizer manufacturing facility at that address. The permit will allow the phosphoric acid production rate of the Nos. 3 and 4 plants to be increased from a total of 139 to 170 tons of P2O5 per hour along with the installation of a new packed scrubber for the No. 3 acid filter. A determination of Best Available Control Technology (BACT) was required since the modification as proposed by the applicant would be subject to Prevention of Significant Deterioration (PSD) regulations. An ambient air impact analysis was not required since there will be a decrease in allowable emissions from 0.017 to 0.0135 pounds of fluoride per ton of phosphoric acid product as P2O5. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) with the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrants reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is assigned to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed

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BUREAU OF AIR REGULATION

INA S. KENNEDY
Notary Public, State of Florida
My comm. expires April 21, 2000
FLA CC#000001



DEP
JUL 20 1996
SOUTHWEST DISTRICT
TAMPA